

Geoffrey M. Drake, *pro hac vice*  
TaCara D. Harris, *pro hac vice*  
David Mattern, *pro hac vice*  
King & Spalding LLP  
1180 Peachtree Street, NE, Suite 1600  
Atlanta, GA 30309  
Telephone: + 1 (404) 572-4600  
Facsimile: + 1 (404) 572-5100  
Email: [gdrake@kslaw.com](mailto:gdrake@kslaw.com)  
[tharris@kslaw.com](mailto:tharris@kslaw.com)  
[dmattern@kslaw.com](mailto:dmattern@kslaw.com)

*Attorneys for Defendants TikTok Inc.,  
ByteDance Inc., ByteDance Ltd.,  
TikTok Ltd., and TikTok LLC*

*Additional parties and counsel listed on  
signature pages*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

**THIS DOCUMENT RELATES TO:**

Case No. 4:22-md-03047-YGR-TSH

## ALL ACTIONS

Honorable Yvonne Gonzalez Rogers

**DEFENDANTS' MOTION TO REMOVE  
INCORRECTLY FILED DOCUMENT**

Defendants make this application for the purpose of seeking to remove two filings—Dkt. Nos. 743 and 743-9—from the April 5, 2024 filing of their Administrative Motion Pursuant to Civil Local Rule 7-11 for Amendment of Deadlines Under Case Management Order 10 and Other Relief (Dkt. 743, “the Motion”), relating to Plaintiffs’ deadline to serve Plaintiff Fact Sheets under Case Management Order 10.

The day after Defendants filed the Motion, Plaintiffs requested that Defendants redact certain information in the Motion relating to two adult plaintiffs' last names and certain information in Exhibit 8 thereto. Although Defendants disagree that this information was required to be redacted under the Parties' Protective Order or for any other reason, Defendants have agreed to file redacted versions to avoid burdening the Court with an unnecessary dispute. Accordingly, Defendants have already filed "corrected" versions of both documents.

Defendants thus ask that Docket No. 743 (the Motion) be replaced with Docket No. 744 and that Docket No. 743-9 (Exhibit 8 thereto) be replaced with 744-1.

Counsel for Defendants have already notified the Court's civil docketing clerk of this issue and related request.

Dated: April 8, 2024

Respectfully submitted,

KING & SPALDING LLP

s/ Geoffrey M. Drake  
Geoffrey M. Drake, *pro hac vice*  
TaCara D. Harris, *pro hac vice*  
KING & SPALDING LLP  
1180 Peachtree Street, NE, Suite 1600  
Atlanta, GA 30309  
Telephone: + 1 (404) 572-4600  
Email: [gdrake@kslaw.com](mailto:gdrake@kslaw.com)  
[tharris@kslaw.com](mailto:tharris@kslaw.com)

David P. Mattern, *pro hac vice*  
KING & SPALDING LLP  
1700 Pennsylvania Avenue, NW  
Suite 900  
Washington, DC 20006-4707  
Telephone: + 1 (202) 737-0500  
Facsimile: + 1 (202) 626-3737  
Email: [dmattern@kslaw.com](mailto:dmattern@kslaw.com)

FAEGRE DRINKER LLP

/s/ Andrea Roberts Pierson  
Andrea Roberts Pierson, *pro hac vice*  
FAEGRE DRINKER LLP  
300 N. Meridian Street, Suite 2500

1 Indianapolis, IN 46204  
2 Telephone: + 1 (317) 237-0300  
3 Facsimile: + 1 (317) 237-1000  
Email: andrea.pierson@faegredrinker.com

4 Amy Fiterman, *pro hac vice*  
5 FAEGRE DRINKER LLP  
6 2200 Wells Fargo Center  
7 90 S. Seventh Street  
8 Minneapolis, MN 55402  
Telephone: +1 (612) 766-7768  
Facsimile: +1 (612) 766-1600  
Email: amy.fiterman@faegredrinker.com

9 *Attorneys for Defendants TikTok Inc.,*  
10 *ByteDance Inc., ByteDance Ltd., TikTok Ltd., and*  
11 *TikTok LLC*

12 **COVINGTON & BURLING LLP**

13 /s/ Ashley M. Simonsen  
14 Ashley M. Simonsen, SBN 275203  
15 COVINGTON & BURLING LLP  
16 1999 Avenue of the Stars  
17 Los Angeles, CA 90067  
Telephone: + 1 (424) 332-4800  
Facsimile: +1 (424) 332-4749  
Email: asimonsen@cov.com

18 Phyllis A. Jones, *pro hac vice*  
19 Paul W. Schmidt, *pro hac vice*  
20 COVINGTON & BURLING LLP  
21 One City Center  
22 850 Tenth Street, NW  
23 Washington, DC 20001-4956  
Telephone: + 1 (202) 662-6000  
Facsimile: + 1 (202) 662-6291  
Email: pajones@cov.com  
Email: pschmidt@cov.com

24 *Attorneys for Defendants Meta Platforms, Inc. f/k/a*  
Facebook, Inc.; Facebook Holdings, LLC; Facebook  
Operations, LLC; Facebook Payments, Inc.;  
Facebook Technologies, LLC; Instagram, LLC;  
Siculus, Inc.; and Mark Elliot Zuckerberg

1  
2                   **MUNGER, TOLLES & OLSEN LLP**  
3

4                   /s/ Jonathan H. Blavin  
5                   Jonathan H. Blavin, SBN 230269  
6                   MUNGER, TOLLES & OLSON LLP  
7                   560 Mission Street, 27th Floor  
8                   San Francisco, CA 94105-3089  
9                   Telephone: + 1 (415) 512-4000  
10                  Facsimile: + 1 (415) 512-4077  
11                  Email: jonathan.blavin@mto.com  
12

13                  Rose L. Ehler (SBN 296523)  
14                  Victoria A. Degtyareva (SBN 284199)  
15                  Laura M. Lopez (SBN 313450)  
16                  Ariel T. Teshuva (SBN 324238)  
17                  MUNGER, TOLLES & OLSON LLP  
18                  350 South Grand Avenue, 50th Floor  
19                  Los Angeles, CA 90071-3426  
20                  Telephone: + 1 (213) 683-9100  
21                  Facsimile: + 1 (213) 687-3702  
22                  Email: rose.ehler@mto.com  
23                  Email: victoria.degtyareva@mto.com  
24                  Email: laura.lopez@mto.com  
25                  Email: ariel.teshuva@mto.com  
26

27                  Lauren A. Bell (*pro hac vice*)  
28                  MUNGER, TOLLES & OLSON LLP  
29                  601 Massachusetts Ave., NW  
30                  Suite 500 E  
31                  Washington, D.C. 20001-5369  
32                  Telephone: + 1 (202) 220-1100  
33                  Facsimile: + 1 (202) 220-2300  
34                  Email: lauren.bell@mto.com  
35

36                  *Attorneys for Defendant Snap Inc.*  
37

38                  **WILSON SONSINI GOODRICH & ROSATI**  
39                  **Professional Corporation**  
40

41                  /s/ Brian M. Willen  
42                  Brian M. Willen (*pro hac vice*)  
43                  WILSON SONSINI GOODRICH & ROSATI  
44                  1301 Avenue of the Americas, 40th Floor  
45                  New York, New York 10019  
46                  Telephone: + 1 (212) 999-5800  
47                  Facsimile: + 1 (212) 999-5899  
48

1 Email: bwillen@wsgr.com

2 Lauren Gallo White (State Bar No. 309075)  
3 Samantha A. Machock (State Bar No. 298852)  
4 WILSON SONSINI GOODRICH & ROSATI  
One Market Plaza, Spear Tower, Suite 3300  
5 San Francisco, CA 94105  
Telephone: + 1 (415) 947-2000  
Facsimile: + 1 (415) 947-2099  
Email: lwhite@wsgr.com  
Email: smachock@wsgr.com

6  
7 Christopher Chiou (State Bar No. 233587)  
WILSON SONSINI GOODRICH & ROSATI  
953 East Third Street, Suite 100  
10 Los Angeles, CA 90013  
Telephone: + 1 (323) 210-2900  
Facsimile: + 1 (866) 974-7329  
Email: cchiou@wsgr.com

11  
12 *Attorneys for Defendants YouTube, LLC, Google LLC,*  
*and Alphabet Inc.*

13  
14 Joseph G. Petrosinelli  
15 Ashley W. Hardin  
16 WILLIAMS & CONNOLLY LLP  
17 680 Maine Avenue, SW  
Washington, DC 20024  
18 Telephone: + 1 (202) 434-5000  
Facsimile: + 1 (202) 434-5029  
Email: jpetrosinelli@wc.com  
Email: ahardin@wc.com

19  
20 *Attorneys for Defendants YouTube, LLC, Google LLC,*  
*and Alphabet Inc.*

## ATTESTATION

I, Geoffrey M. Drake, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: April 8, 2024

By: /s/ Geoffrey M. Drake  
Geoffrey M. Drake